

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

TATYANA A. BABAKAEVA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 4:09cv58
)	
PAUL H. WILSON and)	
WILSON & WILSON, P.C.,)	
)	
Defendants.)	

MOTION FOR A PROTECTIVE ORDER

NOW COME the Defendants, Paul H. Wilson and Wilson & Wilson, P.C., by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and move the Court to enter a Protective Order directing that certain discovery not be had, or in the alternative that it be limited. Prior to filing the Motion, the Defendants, through their undersigned counsel, conferred b phone with the Plaintiff in an effort to resolve the objections without success. In support of their Motion, the Defendants rely upon the attached Memorandum of Law.

**PAUL H. WILSON and
WILSON & WILSON, P.C.**

By: /s/ Douglas E. Miller
Douglas E. Miller (VSB 38591)
Veronica E. Meade Sheppard (VSB 66727)
Patten, Wornom, Hatten & Diamonstein, L.C.
Suite 300
12350 Jefferson Avenue
Newport News, VA 23602
Tele: (757) 223-4536
Fax: (757) 223-4518
dmiller@pwhd.com
vsheppard@pwhd.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 22, 2009, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following. I also served a true copy of the foregoing via first class mail, postage prepaid on:

Tatyana Babakaeva
2124 Criston Drive
Newport News, VA 23602

Plaintiff, appearing pro se

/s/ Douglas E. Miller
Douglas E. Miller (VSB 38591)
Veronica E. Meade Sheppard (VSB 66727)
Patten, Wornom, Hatten & Diamonstein, L.C.
Suite 300
12350 Jefferson Avenue
Newport News, VA 23602
Tele: (757) 223-4536
Fax: (757) 223-4518
dmiller@pwhd.com
vsheppard@pwhd.com
Counsel for Defendants